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The Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Rebecca Linke, et al.  
20 CR 160 (MKV)

Dear Judge Vyskocil:

By this letter I respectfully move for reconsideration of the Court's order of today, denying the unopposed application for a modification of the conditions of Dr. Linke's bail to permit travel to attend a continuing education curriculum.

Local Criminal Rule 49.1(d) requires that in connection with a motion for reconsideration I must identify the matters or authority the Court overlooked, and on reviewing my letter motion it was perhaps insufficiently clear that eight months ago, Your Honor granted the same application by this defendant seeking the same relief, which relief she was nevertheless unable to avail herself of due to the COVID-19 pandemic. (*See* ECF No. 221.) In other words, I should have made explicit that the only difference between the motion filed then and the motion filed yesterday is that Dr. Linke has had the additional intervening eight months to demonstrate her steadfast adherence to the bail conditions set at her arraignment, and thus the greater likelihood that she is not a flight risk. I should reiterate, Your Honor, that yesterday's motion, like the previous one, was accompanied by the consent of both the Government and Pretrial Services.

I therefore most respectfully request that the Court reconsider its ruling. In the alternative, I ask that the Court indicate its reasons for the denial of yesterday's motion in writing, as such is required by F.R.App.P. 9(a)(1) for Ms. Linke to seek

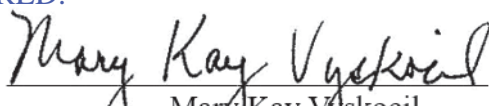
review of your Honor's ruling.

Respectfully submitted,

David Wikstrom

GRANTED. SO ORDERED.

Date: 3/18/2021  
New York, New York

  
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Mary Kay Vyskocil  
United States District Judge